

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

INDICTMENT

19 cr 05 ECT/SER

Plaintiff,

18 U.S.C. § 2261A(1)

v.

SHAWN KELLY THOMASON,

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1
(Interstate Stalking)

Beginning on or about October 12, 2018, and continuing through on or about December 7, 2018, in the State and District of Minnesota and elsewhere, the defendant,

SHAWN KELLY THOMASON,

did travel in interstate commerce with the intent to kill, injure, harass, intimidate, and place under surveillance with the intent to kill, injure, harass, and intimidate another person, and in the course of and as a result of such travel and presence, engaged in conduct that placed another person in reasonable fear of death and serious bodily injury and caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to that person, to wit, Victim A, all in violation of Title 18, United States Code, Section 2261A(1).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON

